

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Martha Vassalle, et al.
Plaintiffs,

vs.

Midland Funding, LLC, et al.
Defendants

)
) Case No. 3:11CV-00096
)
)
) HON. JUDGE DAVID A. KATZ
)
) And Related Cases:
) Case No. 3:08 -cv-01434
) Case No. 3:10-cv-0091

DECLARATION OF MATTHEW J. ERAUSQUIN

I, Matthew J. Erausquin, an adult individual, depose upon my oath and declare the following to be true and correct:

1. I am an attorney with the law firm of Consumer Litigation Associates, P.C. Our firm currently represents 604 individuals with respect to various claims against Encore Capital Group, Inc., Midland Funding, LLC and Midland Credit Management, Inc. (hereafter, the Encore Defendants).

2. Following our discussions with the Court and with class counsel regarding the substance of letters to our clients clarifying their decision as to whether to file a claim in this case, or opt out of the proposed settlement, we sent the letters and blue election forms to each of our clients. This mailing was completed on June 30, 2011.

3. We have received a total of 295 postcard responses from our clients. Of these responses, 209 individuals stated or re-affirmed their decision to opt out of the class. 86 individuals indicated that they wished to file a claim.

Under penalty of perjury under the laws of the United States of America, I hereby declare and affirm that the foregoing information is true and correct to the best of my information, knowledge and belief.


Matthew J. Erausquin, VSB #65434